4 Aldersev Street, #6 Somerville MA 02143-1830

15 August 1999

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Dockets Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane, Room 1031 Rockville MD 20852

To Whom It May Concern:

Re: Docket Numbers 98N-1230, 96P-0418, 97P-0197

I write in support of the petition to eliminate "forced molting," a practice pertaining to the treatment of egg-producing hens.

Evidence suggests that this custom contributes to increased disease states in the hens, whose contaminated eggs are passed along to consumers. This practice is therefore highly questionable based on considerations of human health alone.

But my objection to forced molting goes beyond this worrisome consideration, because I care about the well being of both humans and chickens. Simply stated, forced molting is one of the cruelest practices imaginable. Forced molting involves removing food from hens for up to 14 days in order to induce one last egg-laying cycle before being sent to slaughter. The reason for this is solely to increase egg production and thus farmers' profits. For most hens the chronic misery of being imprisoned in overcrowded, filthy battery cages, too small for them to even turn around or flap their wings in, is made unbearably worse by being deprived of food. To complete this scene of torture, farmers often subject the birds to constant artificial daylight for several days, followed by constant darkness for several more, in an effort to control hormonal cycles and bring about the final egg-laying period. Such extreme and unnatural alternations of light and darkness, all to squeeze a little more money from their poor bodies, further stress the hens, weakening, deranging, and sometimes killing them.

But because chickens are small animals (relative to cows or pigs, for example) losing an individual bird, or even quite a few, doesn't matter much to the poultry farmer, many of whom possess thousands, tens of thousands, or even more birds at any one time. (According to USDA statistics, over 400 million layer hens are sent to slaughter in the U.S. each year, so it's clear the farmer can give little consideration to any individual animal.) The fact that the poultry industry views chickens as mere "production units" allows them to ignore or rationalize the enormous suffering inflicted on these feeling, sentient creatures.

That is why it's incumbent upon caring individuals and responsible government agencies to protect chickens from cruel treatment, no matter what justification is given for such treatment.

In my opinion forced molting -- more properly referred to as starvation -- is inherently so cruel as to be completely unjustifiable, and is certainly unworthy of a human society that prides itself on striving towards justice and compassion. I therefore respectfully ask you to grant this petition.

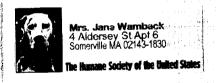
Thank you for considering my comments; I look forward to your reply.

Sincerely yours,

Jane Wamback
Jane Wamback

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96 P-0418







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CROSS FILE SHEET

File Number:

98N-1230/C284

See File Number:

97P-0197/C285 96P-0418/C384